



**NAPOLI  
SHKOLNIK PLLC**  
ATTORNEYS AT LAW

Christopher LoPalo  
Partner – New York Office  
Clopalo@napolilaw.com

May 24, 2017

**Via: ECF**

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

The Honorable Sarah Netburn  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

*Re: In Re Terrorist Attacks on September 11, 2001, No. 03-md-1570 (GBD)(SN)*  
*Addesso v. Kingdom of Saudi Arabia, 16-cv-9937 (GBD)(SN)*  
*Abarca v. Kingdom of Saudi Arabia, 17-cv-3887 (GBD)(SN)*  
*Aguilar v. Kingdom of Saudi Arabia, 16-cv-9663 (GBD)(SN)*  
*Aiken v. Kingdom of Saudi Arabia, 17-cv-450 (GBD)(SN)*  
*Hodges v. Kingdom of Saudi Arabia, 17-cv-117 (GDB)(SN)*

Dear Judge Daniels and Judge Netburn:

We represent the Plaintiffs in the above referenced matters. The Abarca v. Kingdom of Saudi Arabia, 17-cv-3887 (GBD)(SN) matter is a new action that was filed on May 23, 2017. The Abarca matter has claims against Defendants the Kingdom of Saudi Arabia and the Saudi High Commission for Relief of Bosnia & Herzegovina (the “Sovereign Defendants”) along with claims against Defendants National Commercial Bank, Al Rajhi Bank and Saudi Binladin Group (the “Non-Sovereign Defendants”). A Short Form Complaint for claims against the Sovereign Defendants pursuant to this Court’s May 3, 2017 Order ECF No. 3543 along with a stipulation adopting the allegations as to the Non-Sovereign Defendants pursuant to this Court’s May 16, 2017 Order ECF No. 3584 were filed in the Abarca matter. Plaintiffs respectfully request that the Abarca matter be made part of *In Re Terrorist Attacks on September 11, 2001*, No. 03-md-1570 (GBD)(SN).

Additionally, Short Form Complaints pursuant to this Court's May 3, 2017 Order ECF No. 3543 for claims against the Sovereign Defendants along with a stipulations adopting the allegations as to the Non-Sovereign Defendants pursuant to this Court's May 16, 2017 Order ECF No. 3584 were recently filed in the Addesso v. Kingdom of Saudi Arabia, 16-cv-9937 (GBD)(SN); Aguilar v. Kingdom of Saudi Arabia, 16-cv-9663 (GBD)(SN); Aiken v. Kingdom of Saudi Arabia, 17-cv-450 (GBD)(SN); and Hodges v. Kingdom of Saudi Arabia, 17-cv-117 (GDB)(SN) related matters. All filings have also been filed on the 03-MDL-1570 Master Docket.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Christopher LoPalo', with a stylized flourish extending to the right.

Christopher LoPalo

cc: All Counsel of Record via ECF